

United States Courts
Southern District of Texas
FILED

MAR 28 2018

David J. Bradley, Clerk of Court

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS

HOUSTON DIVISION

UNITED STATES OF AMERICA

V.

JULIA GOTTSELIG POFF,
Defendant

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CRIMINAL NO.

H CR 17-669-S

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

(Injurious Articles as Nonmailable)

On or about October 2, 2016, within the Southern District of Texas, and elsewhere within the jurisdiction of the Court, the defendant,

JULIA GOTTSELIG POFF,

did knowingly, and with the intent to kill and injure another, deposit for mailing and delivery something declared nonmailable by Title 18, United States Code, Section 1716, not in accordance with rules and regulations prescribed by the United States Postal Service, to wit: an explosive and destructive device and compositions which may ignite and explode, which Julia Poff mailed to Governor Greg Abbott, 1010 Colorado Street, Austin, Texas 78701.

In violation of 18 U.S.C. Sections 1716(a), 1716(j)(2) and 2.

COUNT TWO
(Using a Destructive Device During or In Relation to a Crime of Violence)

On or about October 2, 2016, within the Southern District of Texas, and elsewhere within the jurisdiction of the Court, the defendant,

JULIA GOTTSELIG POFF,

did knowingly use a firearm, to wit: a destructive device, during and in relation to a crime of violence for which she may be prosecuted in a court of the United States, to wit: Injurious Articles as Nonmailable, in violation of 18 U.S.C. Sections 1716(a) and (j)(2), as alleged in Count One.

In violation of Title 18, United States Code, Section 924(c)(1)(A) and (B)(ii).

COUNT THREE
(Transportation of Explosives with the Intent to Kill and Injure)

On or about October 2, 2016, within the Southern District of Texas, and elsewhere within the jurisdiction of the Court, the defendant,

JULIA GOTTSELIG POFF,

did transport in interstate commerce, an explosive, to wit: a destructive device including smokeless powder, fuses, and pyrotechnic composition, with knowledge and intent that the said explosive would be used to kill, injure and intimidate a person, to wit: President Barack Obama, 1600 Pennsylvania Avenue NW, Washington, D.C. 20500.

In violation of Title 18, United States Code, Sections 844(d) and 2.

COUNT FOUR

(Using a Destructive Device During or in Relation to a Crime of Violence)

On or about October 2, 2016, within the Southern District of Texas, and elsewhere within the jurisdiction of the Court, the defendant,

JULIA GOTTSELIG POFF,

did knowingly use a firearm, to wit: a destructive device, during and in relation to a crime of violence for which she may be prosecuted in a court of the United States, to wit: Transportation of Explosives with the Intent to Kill and Injure, in violation of Title 18, United States Code, Sections 844(d), as alleged in Count Three.

In violation of Title 18, United States Code, Section 924(c)(1)(A), (B)(ii) and (C)(ii).

COUNT FIVE

(Transportation of Explosives with the Intent to Kill and Injure)

On or about October 2, 2016, within the Southern District of Texas, and elsewhere within the jurisdiction of the Court, the defendant,

JULIA GOTTSELIG POFF,

did transport in interstate commerce, an explosive, to wit: a destructive device including smokeless powder, fuses, and pyrotechnic composition, with knowledge and intent that the said explosive would be used to kill, injure and intimidate a person, to wit: Commissioner Carolyn Colvin, 6401 Security Blvd., Gwynn Oak, MD 21207.

In violation of Title 18, United States Code, Sections 844(d) and 2.

COUNT SIX

(Using a Destructive Device During or in Relation to a Crime of Violence)

On or about October 2, 2016, within the Southern District of Texas, and elsewhere within the jurisdiction of the Court, the defendant,

JULIA GOTTSELIG POFF,

did knowingly use a firearm, to wit: a destructive device, during and in relation to a crime of violence for which she may be prosecuted in a court of the United States, to wit: Transportation of Explosives with the Intent to Kill and Injure, in violation of Title 18, United States Code, Sections 844(d), as alleged in Count Five.

In violation of Title 18, United States Code, Section 924(c)(1)(A), (B)(ii) and (C)(ii).

COUNT SEVEN

(Supplemental Nutrition Assistance Program Fraud)

From on or about June 10, 2013 to on or about January 30, 2015, within the Southern District of Texas, and elsewhere within the jurisdiction of the Court, the defendant,

JULIA GOTTSELIG POFF,

did knowingly use, transfer, acquire and possess electronic benefit transfer (EBT) authorization cards and access devices of a value of \$5,000 or more, in a manner not authorized by Chapter 51 of Title 7, United States Code, to wit: Julia Poff fraudulently applied for and received Supplemental Nutrition Assistance Program (SNAP) benefits (formerly known as the Food Stamp Program).

In violation of Title 7, United States Code, Section 2024(b).

COUNT EIGHT
(False Declaration in Bankruptcy)

From on or about September 20, 2012 to on or about July 2, 2015, within the Southern District of Texas, and elsewhere within the jurisdiction of the Court, the defendant,

JULIA GOTTSELIG POFF,

in connection with a case under Title 11 of the United States Code, specifically, Bankruptcy case number 12-37006, Julia Poff, Debtor, did knowingly and fraudulently make a declaration and statement under penalty of perjury as permitted under section 1746 of Title 28, in and in relation to the above case under Title 11, that is, the defendant, Julia Poff, submitted schedules containing fraudulent information relating to income and expenses thereby affecting the discharge of debt and unlawfully availed herself of the benefits of the automatic bankruptcy stay.

In violation of Title 18, United States Code, Section 152 (3) and 2.

COUNT NINE
(False Declaration in Bankruptcy)


From on or about May 24, 2016 to on or about September 3, 2016, within the Southern District of Texas, and elsewhere within the jurisdiction of the Court, the defendant,

JULIA GOTTSELIG POFF,


in connection with a case under Title 11 of the United States Code, specifically, Bankruptcy case number 16-32606, Julia Poff, Debtor, did knowingly and fraudulently make a declaration and statement under penalty of perjury as permitted under section 1746 of Title 28, in and in relation


to the above case under Title 11, that is, the defendant, Julia Poff, submitted schedules containing fraudulent information relating to income and expenses thereby affecting the discharge of debt and unlawfully availed herself of the benefits of the automatic bankruptcy stay.

In violation of Title 18, United States Code, Section 152 (3) and 2.


Original signature on File
~~FOREPERSON~~ OF THE GRAND JURY

RYAN K. PATRICK
United States Attorney
Southern District of Texas

By: 
Ralph E. Imperato
Assistant United States Attorney

By: 
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Assistant United States Attorney